

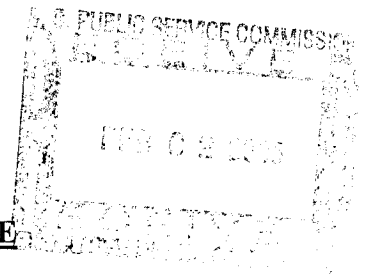
# ELLIS:LAWHORNE

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January 31, 2005

**VIA ELECTRONIC MAIL SERVICE AND 1<sup>ST</sup> CLASS MAIL SERVICE**


The Honorable Charles L.A. Terreni  
Executive Director  
**South Carolina Public Service Commission**  
PO Drawer 11649  
Columbia SC 29211



RE: Application of Symtelco, LLC for a Certificate of Public Convenience and Necessity to Provide Facilities-Based Local Exchange and Resold Long Distance Telecommunications Services, including Operator Services and for Flexible Regulation of its Long Distance Services Within the State of South Carolina  
**Docket No. 2004-334-C, Our File No. 910-10257**

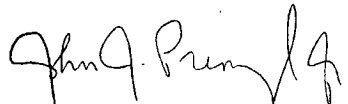
Dear Mr. Terreni:

Enclosed is the original and twenty-five (25) copies of the **Testimony of Greg Hogan** filed on behalf of Symtelco, LLC in the above-referenced docket.

 Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it in the enclosed envelope.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

  
John J. Pringle, Jr.

JJP/cr

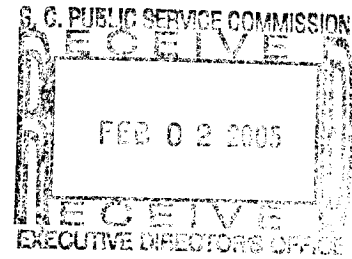
cc: Mr. Greg Hogan  
Mr. Craig Neeld

Enclosures

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BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA



Application of **Symtelco, LLC** )  
For a Certificate of Public Convenience and )  
Necessity to Provide Facilities-Based Local Exchange )  
and Resold Long Distance Telecommunications Services, )  
Including Operator Services, for )  
Flexible Regulation of its Local Exchange Services and )  
Alternative Regulation of its Long Distance Services )  
Within the State of South Carolina )

**Docket No. 2004-334-C**

**Symtelco, LLC**

Testimony of

Greg Hogan, President

RETURN DATE: OK DBR  
SERVICE: \_\_\_\_\_

1    **Q.     State your name and business address.**

2    A.     My name is Greg Hogan. My business address is 1385 Weber Industrial Drive, Cumming, Georgia  
3           30041.

4    **Q.     By whom are you employed and in what capacity?**

5    A.     I am the President of Symtelco, LLC. I am primarily responsible for directing the company's entry  
6           into new markets and for investigating and developing new lines of business for the company.  
7           These responsibilities allow me to interact with all operations of the company.

8    **Q.     Please give a brief description of your background and experience.**

9    A.     I joined Symtelco in September 2002 with the express purpose of creating a telecommunications  
10          company to provide telephone service and other telecommunications services primarily to small  
11          businesses. During the past two years we have received certification to provide local service in  
12          seven states. We are now providing service in California, Florida, Georgia, Kentucky, Louisiana,  
13          North Carolina and Texas. Prior to joining Symtelco, I spent eighteen months as the Director of  
14          Sales & Marketing with Ernest Communications, an unbundled network element platform ("UNE-  
15          P") based competitive local exchange company serving niche based business customers in over  
16          twenty states. While at Ernest I oversaw the Company's doubling in size and implemented  
17          progressive customer support practices to ensure each customer's unique needs and demands were  
18          not lost in the Company's rapid expansion. Prior to Ernest I served as Vice President of Sales and  
19          Marketing for North America at Protel, Inc., a Lakeland, FL based company that is North  
20          America's largest provider of public telephones.

21   **Q.     What is the purpose of your testimony?**

22   A.     The purpose of my testimony is to present evidence describing the technical, managerial and  
23          financial fitness of Symtelco to provide resold and facilities-based local telecommunications  
24          services and interexchange services in South Carolina. This testimony will also describe the  
25          services proposed by Symtelco and the proposed tariff structure. Finally, the purpose of my  
26          testimony is to show that the public interest will be served by approval of the application of

Symtelco for a certificate of public convenience and necessity.

**Q. Has Symtelco registered to do business in South Carolina?**

A. Yes. Symtelco received foreign corporation authority in South Carolina on June 3, 2004.

**Q. Please explain the Company's corporate structure.**

A. Symtelco, LLC is a limited liability company ("LLC") organized in the State of Georgia on September 5, 2002.

**Q. Please describe the services Symtelco proposes to offer.**

A. Symtelco, LLC will provide local exchange and interexchange telecommunications services and related voice based features primarily to businesses, including collect-only telephone services to confinement institutions. Service will also be provided to payphone providers providing pay telephone service as regulated by the Commission. Service is provided twenty-four (24) hours per day, seven (7) days a week.

**Q. Does Symtelco own any network switches or transmission facilities used in routing calls?**

A. No.

**Q. How will Symtelco bill for its services?**

A. Symtelco will bill customers directly. Symtelco's customer bill will contain all information required by Commission Rule 103-622.1.

**Q. How are trouble reports handled?**

A. Symtelco utilizes a nationwide toll-free number 866-766-1515 for customer service. Customers may access a live customer service representative 24 hours a day, seven days a week.

**Q. How are billing errors and complaints handled?**

A. Symtelco utilizes a nationwide toll-free number, 866-766-1515, for customer service. Customers may also contact the Company via mail at the headquarters location, or via email at [cs@smytelco.com](mailto:cs@smytelco.com).

**Q. Describe the proposed Symtelco South Carolina tariffs.**

A. Symtelco has included proposed tariffs that contain the rules, regulations and rates for Symtelco's

1 local exchange, interexchange, and exchange services. Symtelco's services are neither mileage nor  
2 time-of-day sensitive.

3 **Q. Does Symtelco provide operator services?**

4 A. Yes. The Company's final tariff will indicate that the maximum rates for operator service charges  
5 and surcharges will not exceed those rates mandated by Commission Order 2001-997 issued in  
6 Docket No. 2000-407-C. Further, Symtelco is familiar with this Commission's requirements for  
7 inmate telephone providers, and will comply with any applicable existing requirements. Finally,  
8 Symtelco is in the process of seeking payphone service provider ("PSP") certification from this  
9 Commission, and will comply with all applicable PSP Guidelines

10 **Q. Where is Symtelco currently certificated?**

11 A. The Company is certificated in California, Florida, Georgia, Kentucky, Louisiana, North Carolina and  
12 Texas. In addition the Company currently has an application pending in Mississippi. Symtelco has not  
13 been denied certification from any state utility commission nor has it had a certificate revoked in any  
14 state.

15 **Q. Describe Symtelco's financial ability to operate as a telecommunications provider.**

16 A. Symtelco has ample capital to provide the services for which authority is requested. Symtelco is  
17 providing its most recent Income Statement and Balance Sheet as proof of its financial stability to  
18 provide the required services within the State of South Carolina. This information is attached and  
19 labeled for identification purposes as Exhibit C of the Company's Application.

20 **Q. Do you believe Symtelco is capable of delivering its proposed services in South Carolina?**

21 A. Yes, in addition to having sufficient financial resources, the senior management team of Symtelco  
22 has a varied and detailed background in telecommunications. In addition, Symtelco has experience  
23 offering telecommunications services on a facilities-basis in California, Florida, Georgia, and  
24 Kentucky.

25 **Q. Where in South Carolina does Symtelco intend to offer its services and how will those**  
26 **services be offered?**

1 A. Symtelco intends to offer local telecommunications service via UNE-P, and interchange services  
2 through resale, throughout the BellSouth serving area to residential and business customers.

3 **Q. Does the Company have offices in South Carolina?**

4 A: No. At least initially, the Company does not intend to have offices in South Carolina.  
5 Accordingly, the Company requests, pursuant to Commission Rule 103-610, that the Commission  
6 authorize the Company to keep its books and records at its offices in Georgia. Upon request, the  
7 Company will provide such books and records to the Commission and its Staff on an expedited  
8 basis and at the Company's expense.

9 **Q. What regulatory treatment is Symtelco seeking for its local exchange services?**

10 A: Symtelco requests that the Commission allow the Company to employ a flexible local exchange  
11 rate structure first authorized by Order No. 98-165 in Docket No. 97-467-C. Specifically,  
12 Symtelco requests that the Commission: a) adopt for its local exchange services a competitive rate  
13 structure incorporating maximum rate levels with the flexibility for rate adjustment below the  
14 maximum rate levels; and b) presume that Symtelco's tariff filings for local exchange services be  
15 valid upon filing, subject to the Commission's authority, within thirty (30) days, to institute an  
16 investigation of such filings. At the discretion of the Commission such filings may be suspended  
17 pending further order of the Commission and any such filings may be subject to the same  
18 monitoring process as the Commission applies to other, similarly situated carriers.

19 **Q. What regulatory treatment is Symtelco seeking for its interexchange services?**

20 A: Symtelco requests that its business service offerings be regulated pursuant to the procedures  
21 described and set forth in Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C, as modified by  
22 Order No. 2001-997 in Docket No. 2000-407-C. Specifically, Symtelco requests that the  
23 Commission regulate its business services in the same manner as the Commission regulates those  
24 of AT&T Communications of the Southern States, Inc. ("AT&T"). Further, Symtelco requests that  
25 the Commission: a) Remove the maximum rate tariff requirements for Symtelco's business  
26 services and future private line, and customer network-type offerings; b) Presume that Symtelco's

1 tariff filings for these services be valid upon filing. However, if the Commission institutes an  
2 investigation of a particular filing within seven (7) days, the tariff filing will be suspended until  
3 further order of the Commission; and c) Grant Symtelco the same treatment as AT&T in  
4 connection with any future relaxation of the Commission's reporting requirements.

5 **Q. Will the Company file all applicable reports as required by the Commission?**

6 A: Yes. The Company is aware of the Commission's requirements that all telecommunications  
7 carriers file one or more reports on South Carolina operations, a gross receipts report, and a  
8 universal service fund contribution report on an annual basis.

9 **Q. How will South Carolina consumers benefit from Symtelco's services?**

10 A. Granting Symtelco's application will introduce a telecommunications service provider committed  
11 to providing high quality, innovative, and technologically advanced services that will further  
12 increase telecommunications competition within the State of South Carolina. Symtelco's service  
13 offerings will increase consumer choice, improve the quality and efficiency in telecommunications  
14 services and will likely lead to the reduction of consumer costs, as well as stimulate development  
15 of additional services by providing competitive incentives to other providers. Thus, granting  
16 Symtelco's application is in the public interest.

17 **Q. Does this conclude your testimony?**

18 A. Yes.